



## Advanced Heat Treat Corp.

### Corporate Office & Service Center

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March 6, 2008

Edwin G. Buckner, P.E.  
AWMD/RESP  
U.S. Environmental Protection Agency  
901 North 5<sup>th</sup> St.  
Kansas City, KS 66101

RE: Advanced Heat Treat Corp., Burton Ave., Waterloo IA (EPA ID IAD056504186)  
Response to 08/15/07 EPA Contractor RCRA Inspection Allegations

Dear Mr. Buckner:

Enclosed is Advanced Heat Treat Corporation's (AHTC) response to EPA's Letter of Warning/Request for Information received by AHTC on February 12, 2008. The response and attachments are identified per the requirements of page 5 of the warning letter.

AHTC contends that the allegation in "Violation 1" is incorrect, and that the data provided show that AHTC was a conditionally exempt small quantity generator of hazardous waste in the period identified in the noted "Violation 1." The data and explanation for this contention are provided in the attachment labeled "Advanced Heat Treat Corp. (AHTC) Response to EPA Letter of Warning/Request for Information - 02/0708." It is AHTC's contention that due to errors in estimating waste volumes prior to November 2006, it has in fact been a CESQG since, at the latest July 04 (after the shipment of the drum of hazardous waste generated in January 03. Consequently some of EPA's request for information is incomplete due to this contention, since AHTC has always considered itself to be a CESQG.

Please contact Ron Kane of AHTC at 319-232-5221 or our environmental consultant at 563-370-4831 with any questions regarding this response.

Sincerely

Gary Sharp  
President and CEO

RESP RECEIVED

MAR 10 2008

Enc.



**Advanced Heat Treat Corp. (AHTC) Response to EPA Letter of  
Warning/Request For Information dated 02/0708.**

**Violation 1**

Documents reviewed in responding to this item include Hazardous Waste Manifests for degreaser solvent and Degreaser "Monthly Solvent Consumption Logs (MSCL) from August 2001 to December 2007. The MSCL's and manifests for these dates are enclosed with the response along with a spreadsheet summarizing the data in these documents as "Response to Violation 1".

Persons consulted for responding to this item were Ron Kane and Gayla Hoppenworth of AHTC.

Attachment I is a summary of the hazardous waste manifest data and the Monthly Solvent Consumption Logs (MSCL). The gallons of shipments recorded by the recycling firm and the gallons and mass of the amount of degreaser solvent (trichloroethylene or TCE) removed are shown in columns 2 and 3. The shipments are highlighted in blue and the Monthly Solvent Consumption Logs are highlighted in yellow. The "Waste Drum Shipped/Comment" column shows which drums were shipped when based on best available information.

A review of this data shows that AHTC was always one drum out of phase from drum generated to drum shipped; e.g. the July 04 shipment of two drums included the waste degreaser cleanouts of Jan 03 and Feb 02. The May 04 drum was left on site. Another fact that is apparent is that AHTC shipped only partially full drums. Every degreaser cleanout resulted in the use of a new hazardous waste drum. These drums were only about 1/3 full, but were manifested as 55 gallons each time. The recycling firm provided the manifests completed before the waste pickup, and AHTC signed them. A review of the data in Attachment I shows that the drums could not have been full when shipped. The data show that every time a degreaser cleanout occurred, a new drum was used until November 06 when the waste material generated during the cleanout started to be weighed.

At the time of the inspection, two drums of degreaser hazardous waste were on site – one dated Sept. 12, 2006 and the other one which the Report of RCRA Compliance Evaluation Inspection" on page 3 said was "believed" to be "marked with an accumulation start date of March 25, 2006." A review of the data in the March 05 MSCL shows that this drum was initially started on March 25, 2005, not 2006. The inspection report on page 3 notes that the Sept. 12, 2006 drum was "approximately 1/3 full." This supports the contention that a new drum is used every time the degreaser is cleaned out. The March 25, 2005 drum was full, however.



Beginning in November 06, AHTC initiated the procedure of weighing the waste material generated by the degreaser cleanouts. When the March 25, 2005 drum was weighed, it was noted to be only 1/3 full and so two additional degreaser cleanouts were placed into the drum using it as a satellite accumulation drum. Both drums of waste were shipped immediately after the RCRA inspection (08/21/07 manifest) a full March 25, 2005 drum and a 1/3 full September 12, 2006 drum. There was no waste on site after that time until the degreaser was cleaned out in December 07 generating 189 pounds of hazardous waste.

The actual degreaser cleanouts, when weighed since Nov 06 have consistently been below 100 kgs. The three cleanouts since that time have averaged 79.1 kgs. The degreaser cleanout volumes recorded prior to this time were estimated by the operator in multiples of 5 gallons. AHTC contends that these estimates were highly inaccurate. Prior to Nov 06, the data was mainly kept for the purpose of demonstrating NESHAP compliance. Since AHTC is well within their permit limits, accuracy was not at a premium for this purpose. Since 2003, the estimate for every degreaser cleanout has been 20 gallons. AHTC contends that this figure could just have easily been 15-18 gallons. The only accurate data available are for the last three cleanouts, where the gallons generated have been in the range of 11.9 to 15.5 gallons. AHTC contends that the more accurate data support the contention that the volume estimates were high. Therefore, AHTC contends that for all practical purposes, it has been a CESQG since at least July of 2004 when the estimated 25 gallon cleanout of February 02 was shipped.

Furthermore, from the data presented, at a minimum, it is clear that AHTC has been a CESQG since August 07 after shipping all on site hazardous waste. AHTC also notes that since August 01, the degreaser cleanout has occurred 10 times (244 lbs estimated), once every 8 months. The other 67 months had waste generation of 0 kg. The FR Vol. 81, No. 56, page 10153 (March 24, 1986) discussed generator status for "episodic generators." The following is stated:

"The Agency has always taken the position that a generator may be subjected to different standards at different times, depending on his generation rate in a given calendar month. Thus a generator of less than 100 kg in one calendar month would be deemed a conditionally exempt generator in that month, subject only to the requirements of 261.5; however, if in the next calendar month, he generates more than 100 kg but less than 1000 kg of any regulated hazardous waste, he is subject to all of the standards being promulgated today, as his generator status has changed."

AHTC is a classic episodic generator. Though the FR states that a generator is subject to the higher generator status requirements in the month when the waste is generated, in point of fact this is not practical, unless the generator chooses to forego all regulatory benefits of the lower generator status. To assure compliance, the facility would always have to maintain its status at the higher generator status. Because the Agency allows generator status to be determined

monthly, it does not seem reasonable that the Agency intended that the generator should be held to a continual higher standard.

Responses to the remaining "Requested Information" items are affected by the above contentions.

### **Requested Information**

The following information was obtained from AHTC records, Ron Kane, Steve Grimm, and Gayla Hoppenworth - employees of AHTC - and was prepared by AHTC's environmental consultant, Gary Douglas.

During the August 15, 2007 inspection, the AHTC hazardous waste storage area was temporarily located in the storage building north of the production building. The drums were relocated from their normal location due to a plant expansion and a lack of space. The pictures presented in this response show the hazardous waste drum where it is normally located on a "hazardous waste cart" that also holds a tote for storing used oil. There is a three inch solid welded metal lip around the edge of the cart to retain any leaks or spills. The cart is kept about 25 feet west of the vapor degreaser. The cart is wheeled to the degreaser when it has to be drained. As the pictures show, there is emergency communication, written emergency procedures, a fire extinguisher and spill cleanup materials located in the immediate area.

1. The monthly solvent consumption logs are provided in the response to Violation 1. All solvent logs from August 01 to December 07 are provided in a clipped together package. The summary spreadsheet for these documents and the manifest are also included.
2. The manifests for waste solvents are provided in the response to Violation 1. These are provided in a stapled batch labeled "AHTC Information Request 2."
3. Inspections have been performed since February 23, 2007 and are reported the form enclosed entitled "Weekly Hazardous Waste Storage Inspection Checklist" and is marked "AHTC Information Request 3. Since generator status can be determined month to month, and currently AHTC is a CESQG, these inspections are not now required.
4. AHTC has an Emergency Action Plan to comply with 29 CFR 1910.38(a). This document is attached and marked as "AHTC Information Request 4. The plan includes a diagram of fire extinguisher locations, which are numerous throughout the plant. Emergencies are announced through an alarm or PA system. An air horn is kept beside the hazardous waste cart (used oil and waste TCE) for emergency communication. All employees have been trained as to its location. A photo of the air air horn, located above the fire extinguisher can be seen in the picture. The hazardous

waste cart is immediately behind the column. Another photo shows a posted SPCC Plan, air horn, and phone marked "AHTC Information Request 4" located in the production office.

5. The Emergency Action Plan includes the last three months of fire extinguisher inspections to show that they maintain an active charge and are regularly inspected. A picture of on site spill control equipment is shown in the photograph labeled "AHTC Information Request 5" is enclosed. The spill equipment is located about 20 feet south of the hazardous waste cart. The last three pages of the Emergency Action Plan are the last three months of completed fire extinguisher inspections.
6. Employee handling HW – See picture presented in Item 4.
7. No arrangements have been made with local authorities, as AHTC has always believed it to be a CESQG based on the analysis presented under "Violation 1," and not requiring this action.
8. The emergency coordinator for the facility is Ron Kane as well as three back up coordinators. The section of the facility SPCC plan that contains this information as well as spill response notification and response procedures is included and labeled "AHTC Information Request 8." The SPCC plans spill response procedures are considered to be the same for any hazardous waste spill. A picture labeled "Information Request 8" shows the emergency coordinator list attached to the hazardous waste cart.
9. See item 4.



03/06/08

## Advanced Heat Treat Corp. Waste Generation

## Response to Violation 1

Month	lbs TCE (Gal)	Manifested off site - gal	Which waste drum shipped/Comments
August-01	731		Estimated 30 Gallons removed from degreaser twice
September-01	0		
October-01	0	55	HW drum shipped 1 Aug. 01 of the 2 drums generated
November-01	0		
December-01	0		
January-02	0		
February-02	304		Estimated 25 Gallons removed from degreaser
March-02	0	55	shipped second drum from Aug 01
April-02	0		
May-02	0		
June-02	0		
July-02	0		
August-02	0		
September-02	0		
October-02	0		
November-02	0		
December-02	0		
January-03	244		Estimated 20 gallons removed from degreaser
February-03	0		
March-03	0		
April-03	0		
May-03	0		
June-03	0		
July-03	0		
August-03	0		
September-03	0		
October-03	0		
November-03	0		
December-03	0		
January-04	0		
February-04	0		
March-04	0		
April-04	0		
May-04	244		Estimated 20 gallons removed from degreaser
June-04	0		
July-04	0	110	shipped drums from Jan 03 and Feb 02 degreaser cleanouts
August-04	0		
September-04	0		
October-04	0		
November-04	0		
December-04	0		
January-05	0		
February-05	0		
March-05	244		Estimated 20 gallons removed from degreaser
April-05	0		
May-05	0		
June-05	0		
July-05	0		
August-05	0		
September-05	0		
October-05	0		
November-05	0		
December-05	0		

03/06/08

## Advanced Heat Treat Corp. Waste Generation

## Response to Violation 1

Month	lbs TCE (Gal)	Manifested off site - gal	Which waste drum shipped/Comments
January-06	0	55	shipped May 04 drum degreaser cleanout
February-06	0		
March-08	0		
April-06	0		
May-06	0		
June-06	0		
July-06	0		
August-06	0		
September-06	244		Sep 06 drum 1/3 full shipped August 07 after inspection, March 05 is full still on site and shipped Aug 07 after inspection/Estimated 20 Gallons removed from degreaser
October-06	0		March 5th drum contained Mar 05, Nov 06, & Apr 07 degreaser cleanouts = 577 lbs TCE
November-06	145 lb		Drum Weighed
December-06	0		
January-07	0		
February-07	0		
March-07	0		
April-07	188 lb		Drum Weighed
May-07	0		
June-07	0		
July-07	0		
August-07	0	110	Shipped Mar 05, Sep 06, Nov 06, & Apr 07 degreaser cleanouts
September-07	0		
October-07	0		
November-07	0		
December-07	189 lb		New drum started, nothing else on site/drum weighed
January-08	0		
	79.0909091		
		11.9086728	
		15.44021025	
		15.52233903	



# AHTC Information Request 1

## ADVANCED HEAT TREAT CORP. MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2001 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6	20	20		DS
7				
8				
9				
10				
11				
12				
13				
14				
15				
16	10 gal.	Ø	Ø	TP
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27	30	30	Ø	Bm/RK
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

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ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2001 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

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ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2001 MACHINE I.D.#: LARGE / (SMALL) FACILITY: (1A) / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <del>10-29-01</del>	106A1			AZ LJ
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

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3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2001 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_  
 3 month rolling average: \_\_\_\_\_  
 Yearly total: \_\_\_\_\_

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ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2001 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21	5 gal			DS
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2002 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 0

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2002 MACHINE I.D.#: LARGE / SMALL FACILITY: 1A / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <u>26</u>	<u>25 gal</u>	<u>25 gal</u>	<u>1 LBS</u>	<u>Diz</u>
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14	<u>5 gal.</u>	<u>Ø</u>	<u>Ø</u>	<u>TP</u>
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A <u>30</u>	B <u>25</u>	C <u>1 lb</u>	

Total monthly solvent usage A - (B + C): (50 x 12.5) - 1 = 625 lbs (5 gal) Revised: 11 March 1997

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: March 2002 MACHINE I.D.#: LARGE SMALL FACILITY: 1A / ML (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	4 gal	—	—	mh
3				
4	4 gal			
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 4	B	C	

Total monthly solvent usage A - (B + C): 4 Gal.

Revised: 11 March 1997

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3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2002 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~ML~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 0

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

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ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2002 MACHINE I.D.#: LARGE SMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21	5 gal			TP/mh
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 5	B	C	

Total monthly solvent usage A - (B + C): 5 gal.

Revised: 11 March 1997

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3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2002 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4	4 gal			DS
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 4	B	C	

Total monthly solvent usage A - (B + C): 4 Gal.

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2002 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A <u>0</u>	B	C	

Total monthly solvent usage A - (B + C): 0

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

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ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2002 MACHINE I.D.#: LARGE SMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16	8 gal.	—	—	TP
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 8 Gal.

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2002 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: JA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	<del>TP</del> 7 gal			
2				
3	7 gal.	φ	φ	TP/ODP
4	6 gal			
5				
6	6 gal	φ	φ	MH
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 13 gal.	B	C	

Total monthly solvent usage A - (B + C): 13 gal.

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2002 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 0  
 3 month rolling average: \_\_\_\_\_  
 Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2002 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	10 Gallons	0	0	Sm
21	10 Gallons	0	0	NT
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 20 gal.	B 0	C 0	

Total monthly solvent usage A - (B + C): 20 gal.

Revised: 11 March 1997

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG *BURTON*

MONTH: December 2002 MACHINE I.D.#: LARGE / SMALL FACILITY: SA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	<i>7 Gallons</i>	<i>0</i>	<i>0</i>	<i>op</i>
3				
4				
5				
6				
7				
8	<i>10 Gallons</i>	<i>0</i>	<i>0</i>	<i>Sm</i>
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A <i>17 gal.</i>	B <i>0</i>	C <i>0</i>	

Total monthly solvent usage A - (B + C): 17 Gal.

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1-2-03	30 gal.	20 gal	5 LBS	DM
2-16-03	6 gal	0	0	OT
3-19-03	15 gal	0	0	AZ
4-22-03	3 gal	0	0	AZ
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 54	B 20	C 0.5	

Total monthly solvent usage A - (B + C): 40 gal 33.5

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: HA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6	5 gal	—	—	NT
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 5 Gal

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

Burton

MONTH: March 2003 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: (A) / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4	36# 3 gals			28/AZ
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19	6 gallons			SM/LJ
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 9 gal

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

Borton

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOGMONTH: April 2003 MACHINE I.D.#: LARGE SMALL FACILITY: (A) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14	5 gal			De
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 5 Gal

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2003 MACHINE I.D.#: LARGE SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27	10 gal			JS
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 10 gal

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2003 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: 1A / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	8 gal			
6				DJ
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 8 gal

Revised: 11 March 1997 Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7	10 gal			DJ
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 10

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: JA / ML (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5	15 gal	0	0	NT
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 15 Gal

Revised: 11 March 1997

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22	8 gal			DS
23				
24				
25				
26				
27				
28				
29				
30	10 gal			NT
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 18 Gal.

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 0  
 3 month rolling average: \_\_\_\_\_  
 Yearly total: \_\_\_\_\_



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26	10 gal	NA	NA	NT
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2003 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15	15			JT BC
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 15

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: March 2004 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: 7A / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <sup>3</sup> / <sub>31/04</sub>	6 gal	NA	NA	BM
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13	5 gal	NA	NA	DS
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	5	—	—	DS
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21	30 gal	20 gal		Dm
22		Degreaser Cleaner		
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7	198			MM
8				
9				
10				
11				
12				
13	58#			DMS
14				
15				
16				
17	256#			DRS
18				
19				
20				
21				
22				
23				
24				
25	742-532 = 210#			DRS
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <u>7/30/04</u>	<u>5 gallons</u>			<u>BM</u>
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <u>8/18/04</u>	<u>10 gal</u>	<u>NA</u>	<u>NA</u>	<u>P.M.</u>
2 <u>8/26/04</u>	<u>10 gal</u>	<u>NA</u>	<u>NA</u>	<u>P.M.</u>
3				
4				
5				
6				
7	<u>September 2, 2004</u>			
8				
9 <u>9/2/04</u>	<u>5 gallons</u>	<u>N/A</u>	<u>N/A</u>	<u>TP/RJ</u>
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53



**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: September 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	5 gallons	N/A	N/A	TP/RJ
3	10 gallons	N/A	N/A	SR/BM
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 15	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: October 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 <sup>10/25</sup>	5 gals.	NONE	NONE	FSM
2 <sup>11/1</sup>	5 gals.	NONE	NONE	FSM
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_  
 3 month rolling average:  
 Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: November 2004 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: ~~A~~ MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	5			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 5

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: December 2004 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_  
 3 month rolling average: \_\_\_\_\_  
 Yearly total: \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2005 MACHINE I.D.#: LARGE SMALL FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4	5.6 gal	none	none	BM
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 6X12=72lb

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2005 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				
10	<i>6 gal</i>	<i>none</i>	<i>NA</i>	<i>BM</i>
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 72 lb

3 month rolling average:

Yearly total:



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: March 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: 1A ML (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
<del>13/12/05</del>	<del>0</del>	<del>0</del>	0	<del>SH</del> Harris
3/15/05	5 gal	0	0	DM
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23	30 gal	20 gal	0	DM
24				
25	5 gal	0	0	DM
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 15 gal

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2005 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	0	0	0	SH
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 0

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	SH
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18	5 Gallons	0	0	AD
19				
20				
21				
22				
23				
24				
25				
26				
27	5 gal	0		RR
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: June 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	Full level		RLK
2 6-17	387# - 335# = 52# worth	NA	NA	DT
3 7-1	320# - 274# 46# total	0#	0#	DT
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	320 - 274# 46#	0	0	DT
2	133 - Empty	NA	NA	CS
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22	35#	—	—	TS
23				
24				
25				
26	15#	—	—	AS
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

Revised: 11 March 1997

Z.53



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2005 MACHINE I.D.#: LARGE SMALL FACILITY: 1A / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6	34 lbs	NA	NA	AD
7				
8				
9				
10				
11				
12				
13	67 lbs	NA	NA	AD
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26	13 lbs	N/A	N/A	RK
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October ~~September~~ 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	0	0	0	RA
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25	10-15 Gallons	0	0	AP
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RL
2				
3				
4				
5				
6				
7	9 #	—	—	RL
8				
9				
10				
11	11 #	0	0	B
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

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3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2005 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RIC
2				
3				
4				
5	22 lbs	0	0	KB
6				
7				
8				
9				
10	56 lbs.	0	0	JEFF Z
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	10 gal	0	0	Dennis
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP $\geq$ 185°F & $<$ 210°F	PH > 5.5 Doc. Actual	INIT
1							
2							
3	0	0	0	RK			
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21	71#	0	0	TS			
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
TTL	A 71	B	C				

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 16 Dec 2005

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total : \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP $\geq$ 185°F & $<$ 210°F	PH > 5.5 Doc. Actual	INIT
1	0	0	0	RIL			
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
TTL	A	B	C				

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 16 Dec 2005

Z.53

3 month rolling average: \_\_\_\_\_ Yearly total : \_\_\_\_\_



**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: March 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP $\geq$ 185°F & $<$ 210°F	PH $>$ 5.5 Actual	INIT
1	10 gal	—	—	RU			
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21	37 lbs / 11 gal = 3.1			JZ			
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
TTL	13.1 gal	B	C				

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total : \_\_\_\_\_

Revised: 16 Dec 2005

Z.53

*[Handwritten signatures]*

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2006 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3	0	0	0	RM
4				
5				
6				
7				
8				
9				
10	16 lbs.	0	0	AM
11				
12				
13				
14				
15				
16				
17				
18	42 lbs	0	0	J2
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A 58	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: May 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP 185°F & 210°F	PH 5.5 Doc. Actual	INIT
1	0	0	0	RL			
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14	159						
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
TTL	A	B	C				

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 16 Dec 2005

Z.53

3 month rolling average: \_\_\_\_\_

Yearly total : \_\_\_\_\_

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	10 gal	0	0	AD
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: July 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3	10 gallons	0	0	AD
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19	79 lbs	0	0	AS
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:



36 # & p 5

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: August 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	Rll
2	<del>39#</del>			
3	39#	0	0	TV
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16	60#	0	0	AK
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27	50#	0	0	J2
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: September 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RN
2				
3				
4				
5	36 <del>gal</del> <sup>lb</sup>			DS
6				
7				
8				
9				
10				
11				
12	236 LBS	20 gal	5 LBS (tank cleaned)	DM
13				
14				
15				
16				
17				
18				
19				
20				
21	26 lbs	0	0	J2
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average:

Yearly total:

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: October 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	0	0	0	ML
3				
4				
5				
6				
7				
8	54#	NA	NA	MB
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24	40#	NA	NA	AC/TV
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: November 2006 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2 ✓	41 #	NA	NA	DS
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14	27 #	NA	NA	DS/TS
15				
16				
17				
18				
19				
20				
21	31 #	NA	NA	JZ
22	237 LB	145 LBS	NA	DM
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: December 2006 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	86#	0	0	RM
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19	41 / 15	0	0	JZ
20				
21				
22				
23				
24				
25				
26	48#			JZ
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

Revised: 11 March 1997

Z.53

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: January 2007 MACHINE I.D.#: LARGE (SMALL) FACILITY: IA MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	02	0	0	RK
3				
4	24 gal = 290 lb			RS
5				
6				
7				
8				
9				
10				
11	13 #	0	0	JB/MS
12				
13				
14				
15	41 #	0	0	AL/AD
16				
17				
18				
19				
20				
21				
22				
23				
24	48 #	0	0	AD
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 392 lbs

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: February 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: (A) MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1 ✓	33 <sup>#</sup>			SP (PCC)
2				
3				
4				
5				
6				
7 ✓	31			
8				JS
9				
10				
11				
12 ✓	22			JS
13				
14				
15				
16				
17	31			JS
18				
19				
20				
21				
22				
23				
24				
25				
26	20 <sup>#</sup>	None	None	JS
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 137<sup>#</sup>

3 month rolling average:

Yearly total:



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: March 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	WU
2	53			RS
3				
4				
5				
6	47			RS
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	22#			TS/SAP
21				
22				
23				
24				
25				
26				
27				
28				
29	43#			TS/CT
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 157#

3 month rolling average:

Yearly total:

Revised: 11 March 1997

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: April 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2	42	0	0	JD
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13	25	0	0	JD
14				
15				
16				
17				
18				
19				
20				
21	14	0	0	JD
22				
23				
24				
25				
26	324 lbs	188 lbs 2136 #	0	DL BOM
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 217 #

3 month rolling average:

Yearly total:

Revised: 11 March 1997

Z.53

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: May 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

Day	AMOUNT OF SOLVENT ADDED (lbs./gal)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS	SUMP TEMP <input type="checkbox"/> 185°F & <input type="checkbox"/> 210°F	PH <input type="checkbox"/> 5.5 Doc. Actual	INIT
1	0	0	0	DL			
2							
3	32	0		R			
4							
5							
6							
7	24	0		R			
8							
9							
10							
11							
12							
13	24	0		JZ			
14							
15							
16							
17	43	0		DH			
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31	33	0		DS			
TTL	A	B	C				

Total monthly solvent usage A - (B + C): 154

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 16 Dec 2005

Z.53

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: June 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RLC
2				
3				
4				
5				
6				
7				LJZ
8	25	0		
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19	22	0	0.7	RL
20				
21				
22	43	0		HP/DS
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): \_\_\_\_\_

3 month rolling average: \_\_\_\_\_

Yearly total: \_\_\_\_\_

Revised: 11 March 1997

Z.53

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

MONTH: July 2007 MACHINE I.D.#: LARGE / ~~SMALL~~ FACILITY: IA / ~~MI~~ (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1				
2				
3				
4				
5				
6				
7				
8				
9				DS
10	43			
11	<del>32</del> 7/28			MS 15/28
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28	32			MS
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 77#

3 month rolling average:

Yearly total:

Revised: 11 March 1997 Z.53

BR 8-1-07

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

7990

MONTH: August 2007 MACHINE I.D.#: LARGE / SMALL FACILITY IA / MI (Circle appropriate vessel or facility)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	AS
2				
3				
4				
5				
6				
7				
8	19	0	0	bs
9				
10				
11				
12				
13				
14				
15				
16				
17				
18	SEE JUNE			
19				
20				
21				
22				
23				
24				
25				
26				
27	17 lbs	0	0	JZ
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 190 36 #

3 month rolling average:

Yearly total:



ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG *Buton*

MONTH: September 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	143	0	0	TV
2	34 lbs	0	0	DA
3				
4				
5				
6				
7				
8				
9				
10				
11	25 lbs	0	0	SL
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30	30			
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 201 #  
 3 month rolling average: 2324  
 Yearly total:

**ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG**

*Burton*

MONTH: October 2007 MACHINE I.D.#: LARGE / SMALL FACILITY: IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6	30 lbs	0	0	JZ
7				
8				
9				
10				
11				
12				
13				
14				
15				
16	33 lbs	0	0	DS-
17				
18				
19				
20				
21				
22				
23				
24	20 lbs	0	0	RW
25				
26				
27				
28				
29				
30				
31	23 lbs added	0	0	DH
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 106 #

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

MONTH: November 2007 MACHINE I.D.#: LARGE SMALL FACILITY: IA/MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RLC
2				
3				
4				
5	22 lbs	0	0	JZ
6				
7	28 lbs	0	0	RW
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19	31 #	1#	1#	GS
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

Total monthly solvent usage A - (B + C): 81 #

3 month rolling average:

Yearly total:

ADVANCED HEAT TREAT CORP.  
MONTHLY SOLVENT CONSUMPTION LOG

Benton

MONTH: Dec November 2007 MACHINE I.D.# LARGE / SMALL FACILITY IA / MI (Circle appropriate vessel or facility.)

DAY	AMOUNT OF SOLVENT ADDED (lbs. / gal.)	AMOUNT OF SOLVENT DRAINED	AMOUNT OF SOLIDS REMOVED	INITIALS
1	0	0	0	RK
2				
3				
4				
5				
6				
7				
8				
9	32 #			(B)
10				
11				
12				
13	263 LBS	189 LBS	0 + Drain + Clean D 12	
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
TOTAL	A	B	C	

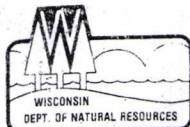
Total monthly solvent usage A - (B + C): 106 #

3 month rolling average:

Yearly total:



SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN  
Chapter 291, Wis. Stats.  
Form 4400-66P

Rev. 1-99

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State of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>IA056504186</b>		Manifest Document No. <b>101136</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <b>ADVANCE HEAT TREAT CORP 2839 BURTON AVE. WATERLOO, IA 50703</b>				Site Location If Different		A. State Manifest Document Number <b>WIK 098156</b>				
4. Generator's Phone <b>319 232-5221</b>				5. Transporter 1 Company Name <b>HYDRITE CHEMICAL-W</b>		B. State Generator's ID				
6. US EPA ID Number <b>IA056504186</b>				7. Transporter 2 Company Name <b>TRANSWOOD</b>		C. State Transporter's ID <b>0096</b>				
8. US EPA ID Number <b>NE0000090580</b>				9. Designated Facility Name and Site Address <b>WRR ENVIRONMENTAL SERVICES 5200 STATE RD. 93 EAU CLAIRE, WI 54701</b>		D. Transporter's Phone <b>319 232-9731</b>				
10. US EPA ID Number <b>WID990829475</b>				11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <b>a. RQ, WASTE TRICHLOROETHYLENE, 6.1, UN1710, PGIII, (F001)</b>		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
						20/DM		2005	6	F001
J. Additional Descriptions for Materials Listed Above <b>a) D022 D039 D040</b>						K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information <b>a) 113405WLA - 188702</b>  <b>Emergency Phone Number: (319) 232-5221</b>										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name & Position Title <b>X Ronald Kone - Facilities Manager</b>				Signature <i>X Ronald Kone</i>		Date Month Day Year <b>10/30/2001</b>				
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title <b>X James C Boeckman Driver</b>				Signature <i>X James C Boeckman</i>		Date Month Day Year <b>10/30/2001</b>				
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title				Signature		Date Month Day Year				
19. Discrepancy Indication Space										
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Printed/Typed Name & Position Title				Signature		Date Month Day Year				

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

- 1 - Generator send to Wis. DNR
- 2 - Generator retain
- 3 - Facility send to Wis. DNR

- 4 - Facility retain
- 5 - Facility send to Generator
- 6 - Transporter retain

Emergency 24 Hour Assistance  
and Spill Reporting

Telephone Number: (800) 943-0003

COPY 2-  
GENERATOR RETAIN

Copies 1 & 3 mail to Wis. DNR at above address.



SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



# STATE OF WISCONSIN

Chapter 291, Wis. Stats.  
Form 4400-66P

Rev. 1-99

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Bureau of Waste Management  
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Form Approved. OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>IA056504186</b>		Manifest Document No. <b>63384</b>		2. Page 1 <b>1 of 1</b>		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>ADVANCED HEAT TREAT CORP 2839 BURTON AVE., WATERLOO, IA 50703</b>						A. State Manifest Document Number <b>WIK183384</b>							
4. Generator's Phone <b>319-232-5221</b>						B. State Generator's ID							
5. Transporter 1 Company Name <b>HYDRITE CHEMICAL - WL</b>				6. US EPA ID Number <b>IAT200010593</b>		C. State Transporter's ID <b>UPW100011MN</b>							
7. Transporter 2 Company Name <b>TRANSWOOD</b>				8. US EPA ID Number <b>NE0000080580</b>		D. Transporter's Phone <b>319-232-9731</b>							
9. Designated Facility Name and Site Address <b>WRR ENVIRONMENTAL SERVICES 5200 STATE RD. 93 EAU CLAIRE, WI 54701</b>				10. US EPA ID Number <b>WID990829475</b>		E. State Transporter's ID <b>UPW05407770B</b>							
						F. Transporter's Phone <b>800-220-1555</b>							
						G. State Facility's ID							
						H. Facility's Phone <b>715-834-9624</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
a. <b>RQ, WASTE TRICHLOROETHYLENE, 6.1, UN1710, PGIII, (FO01)</b>						<b>001 dm</b>		<b>00055 G</b>				<b>FO01</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above <b>a) D022 D039 D040</b>						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information <b>a) 113405WLA142252</b>  <b>EMERGENCY PHONE NUMBER: 319-232-5221</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name & Position Title <b>*Arnold Kane - maintenance manager</b>						Signature <b>*Arnold Kane</b>						Date Month Day Year <b>03/05/2002</b>	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title <b>*James C Boeckman Driver</b>						Signature <b>*James C Boeckman</b>						Date Month Day Year <b>03/05/2002</b>	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials Printed/Typed Name & Position Title						Signature						Date Month Day Year	
19. Discrepancy Indication Space													
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name & Position Title						Signature						Date Month Day Year	

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR

4 - Facility retain  
5 - Facility send to Generator  
6 - Transporter retain

Emergency 24 Hour Assistance  
and Spill Reporting

Telephone Number: (800) 943-0003

COPY 1-

GENERATOR SEND TO WI DNR

Copies 1 & 3 mail to Wis. DNR at above address.



INSTRUCTIONS ON REVERSE SIDE OF COPY 6.



STATE OF WISCONSIN

Chapter 291, Wis. Stats.

Form 4400-66P

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Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		Site Location If Different		A. State Manifest Document Number		
ADVANCED HEAT TREAT CORP 2839 BURTON AVE., WATERLOO, IA 50703				WIK 437060		
4. Generator's Phone		6. US EPA ID Number		B. State Generator's ID		
319-232-5221						
5. Transporter 1 Company Name		8. US EPA ID Number		C. State Transporter's ID		
HYBRITE CHEMICAL, WI		IAT000010522		UPW100011281		
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone		
TRANSMOOD		WID000000000		319-232-9731		
9. Designated Facility Name and Site Address				E. State Transporter's ID		
WRR ENVIRONMENTAL SERVICES		WID990829475		UPW05407770H		
5200 STATE RD. 93				F. Transporter's Phone		
EAU CLAIRE, WI 54701				800-220-1555		
				G. State Facility's ID		
				H. Facility's Phone		
				715-834-9624		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a) RO, WASTE TRICHLOROETHYLENE, 6.1, UN1710, PGIII, (FOO1)		002	DM	00.110	G	FOO1
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
a) D022 D039 D040						
15. Special Handling Instructions and Additional Information						
a) 113405WLA168394						
EMERGENCY PHONE NUMBER: 319-232-5221						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;						
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title		Signature		Date		
X Ronald Kane - Maintenance		X Ronald Kane		07/13/2004		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
X Mike Schoonover driver		X Mike Schoonover		07/13/2004		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title		Signature		Date		

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution: 1 - Generator send to Wis. DNR  
2 - Generator retain  
3 - Facility send to Wis. DNR

4 - Facility retain  
5 - Facility send to Generator  
6 - Transporter retain

Emergency 24 Hour Assistance  
and Spill Reporting  
Telephone Number: (800) 943-0003

COPY 2-  
GENERATOR RETAIN

Copies 1 & 3 mail to Wis. DNR at above address.



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Form Approved OMB No. 2050-0039.

# UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.  
**IAD058504186**

Manifest  
Document No.  
**07313**

2. Page 1  
1 of 1

Information in the shaded areas  
is not required by Federal law.

3. Generator's Name and Mailing Address

**ADVANCED HEAT TREAT CORP  
2839 BURTON AVE., WATERLOO, IA 50703**

Site Location If Different

4. Generator's Phone **319-232-5221**

5. Transporter 1 Company Name  
**HYDRITE CHEMICAL - WL**

6. US EPA ID Number

**IAT200010593**

7. Transporter 2 Company Name  
**TRANSWOOD**

8. US EPA ID Number

**NE0000080580**

9. Designated Facility Name and Site Address

**WRR ENVIRONMENTAL SERVICES  
5200 STATE RD. 93  
EAU CLAIRE, WI 54701**

10. US EPA ID Number

**WID990829475**

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. **RQ, WASTE TRICHLOROETHYLENE, 6.1, UN1710, PGIII, (FOO1)**

12. Containers  
No. Type

**001 PM**

13. Total  
Quantity

**00.055 G**

14. Unit  
WeVal

**G**

Waste No.

**FOO1**

15. Special Handling Instructions and Additional Information

**A) 113405WLA185950**

**EMERGENCY PHONE NUMBER: 319-232-5221**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;

OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name &amp; Position Title

**Frank Kane - Maintenance Manager**

Signature

*Frank Kane*

Date

**07/17/2006**

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials

Printed/Typed Name &amp; Position Title

**Mike Schoonover, driver**

Signature

*Mike Schoonover*

Date

**07/17/2006**

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials

Printed/Typed Name &amp; Position Title

Signature

Date

**07/17/2006**

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name &amp; Position Title

Signature

Date

**07/17/2006**

A Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

1 - Generator send to Wis. DNR

4 - Facility retain

2 - Generator retain

5 - Facility send to Generator

3 - Facility send to Wis. DNR

6 - Transporter retain

Copies 1 &amp; 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance  
and Spill Reporting

Telephone Number: (800) 943-0003

COPY 3

FACILITY SEND TO WI DNR



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>IADO56504186</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>319-232-5221</b>	4. Manifest Tracking Number <b>000973108 FLE</b>							
5. Generator's Name and Mailing Address <b>ADVANCED HEAT TREAT CORP 2839 BURTON AVE. WATERLOO, IA 50703</b>					Generator's Site Address (if different than mailing address)							
6. Transporter 1 Company Name <b>HYDRITE CHEMICAL - WI</b>					U.S. EPA ID Number <b>IAT200010593</b>							
7. Transporter 2 Company Name <b>TRANSWOOD</b>					U.S. EPA ID Number <b>NE0000080580</b>							
8. Designated Facility Name and Site Address <b>WRR ENVIRONMENTAL SERVICES 5200 RIDER ROAD WATERLOO, WI 54701</b>					U.S. EPA ID Number <b>WID990829475</b>							
9a. HM					9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
1.		RQ WASTE TRICHLOROETHYLENE, 6.1, UN1710, PGIII, (FOO1)			2		DM	110	G	FOO1	DO22	DO39
2.										DO40		
3.												
4.												
14. Special Handling Instructions and Additional Information <b>1)113405WLA204214</b>												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Officer's Printed/Typed Name <i>Ronald Kane</i>					Signature <i>Ronald Kane</i>			Month Day Year 8 21 07				
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____												
17. Transporter Acknowledgment of Receipt of Materials												
Transporter 1 Printed/Typed Name <i>Michael J. Kane</i>					Signature <i>Michael J. Kane</i>			Month Day Year 8 21 07				
Transporter 2 Printed/Typed Name					Signature			Month Day Year				
18. Discrepancy												
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection												
Manifest Reference Number:												
18b. Alternate Facility (or Generator) U.S. EPA ID Number												
Facility's Phone:												
18c. Signature of Alternate Facility (or Generator) Month Day Year												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1.		2.		3.		4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name					Signature			Month Day Year				

# AHTC Information Request 3

## Weekly Hazardous Waste Storage Inspection Checklist

Week Ending: 2-23-08

Inspector: Muel Kaur

Signature

1. Is there hazardous waste in storage? Yes or No? Circle. If "no", stop here.
2. Is drum labeled hazardous waste and accumulation start dated? Yes or No? Start
3. Is drum leaking or damaged? Yes or No?
4. Is drum tightly closed? Yes or No?
5. Is drum in storage less than 180 days? Yes or No? Drums must be shipped by 180 days from accumulation start date.
6. Is drum on a containment pallet to catch any leaks or spillage? Yes or No?
7. Is spill clean up or absorbent material nearby? Yes or No?

8. Start Fill date 12-13-07 Pounds 235#

If any of the answers to the above were "no", explain corrective actions taken by whom and when \_\_\_\_\_

Week Ending: 3-1-08

Inspector: Muel Kaur

Signature

1. Is there hazardous waste in storage? Yes or No? Circle. If "no", stop here.
2. Is drum labeled hazardous waste and accumulation start dated? Yes or No?
3. Is drum leaking or damaged? Yes or No?
4. Is drum tightly closed? Yes or No?
5. Is drum in storage less than 180 days? Yes or No? Drums must be shipped by 180 days from accumulation start date.
6. Is drum on a containment pallet to catch any leaks or spillage? Yes or No?
7. Is spill clean up or absorbent material nearby? Yes or No?

8. Start Fill Date 12-13-07 Pounds 235#

If any of the answers to the above were "no", explain corrective actions taken by whom and when \_\_\_\_\_



ADVANCED HEAT TREAT, CORP.

**Emergency Action Plan**  
(Employee Emergency Plans)  
1910.38(a)

In order to establish and maintain a working environment where all employees are aware of designated actions employers and employees must take to ensure employee safety from fire and other emergencies, Advanced Heat Treat Corp. has established and will maintain the following Emergency Action Plan. This plan will meet or exceed Iowa Occupational Safety and Health Standards for General Industry 1910.38(a). All employees are responsible for their cooperation with this Emergency Action Plan.

(a)(1)

This plan applies to all emergency action plans required by a particular Occupational Safety and Health Act (OSHA) standard. Advanced Heat Treat Corp. has established and will maintain a written Employee Emergency Action Plan. This plan shall cover those designated actions employers and employees must take to ensure employee safety from fire and other emergencies.

(a)(2)(i)

When a fire alarm is activated or an emergency weather announcement is made (PA System), all Advanced Heat Treat employees shall immediately turn off the equipment they are working on and proceed to the appropriate meeting area. The drawings at the end of this plan detail the exit routes to be followed and/or designated meeting places. An evacuation map is also located on the company bulletin board near the break room.

(a)(2)(ii)

There are NO critical plant operations that will require employees to remain behind to operate. All employees will evacuate the buildings or meet at designated areas.

(a)(2)(iii)

In an emergency situation all employees are to safely evacuate the buildings and immediately meet at the designated meeting place as marked on the Emergency Action Plan drawing, the SE (back) parking lot. If the emergency is weather related the employee will meet inside at the designated area (interior office restrooms). The on-duty Operations Manager, Assistant Operations Manager, Shift Supervisor, or Lead Person will be responsible for taking roll of all employees to determine their presence. Roll should be based on a current and correct knowledge of working employees.

(a)(2)(iv)

Waterloo Fire Department personnel will perform all rescue and medical duties at Advanced Heat Treat Corp..

(a)(2)(v)

All fire and other emergencies should be reported to the 911 Emergency Center. Emergency services outside of Advanced Heat Treat Corp. will be contacted by dialing the 911 Emergency Center telephone number. (Dial 9-9-1-1) Only those employees properly trained and authorized by Advanced Heat Treat Corp. to use portable extinguishers shall attempt to control an incipient state fire with portable extinguishers.

ADVANCED HEAT TREAT, CORP.

(a)(2)(vi)

For further information or explanation of duties under this plan, contact the Human Resources Manager, Assistant Operations Manager, or President.

(a)(3)(i)

Midport facility will utilize the fire alarm system and PA system for announcement of weather related emergencies.

(a)(3)(ii)

Communication of emergency situation will be by activating the fire alarm system or an announcement of a weather emergency. The Human Resources Manager, Operations Manager, Assistant Operations Manager, Shift Supervisor, Lead Person, or Lab Technician will be responsible for making the weather announcement.

(a)(4)

The Advanced Heat Treat Corp. alarm will instruct employees to go to the designated storm emergency area or to evacuate the building. Any emergency that creates an unsafe condition within the plant should follow fire emergency procedures. Any emergency that creates unsafe conditions outside the plant will follow storm emergency procedures.

(a)(5)(i)

The Human Resources Manager, Operations Manager, Assistant Operations Manager, Shift Supervisor and Lead Person will be responsible for the safe and orderly emergency evacuation of all office and plant employees respectfully.

(a)(5)(ii)

The Emergency Action Plan shall be reviewed with all employees when the plan is initially developed, whenever the employee's responsibility or a designated action under the plan changes, and whenever the plan is changed.

(a)(5)(iii)

Upon initial assignment, each employee shall receive a review of the parts of the Emergency Action Plan, which each employee must know to protect the employee in the event of an emergency.

A copy of the Advanced Heat Treat Corp. Emergency Action Plan is located in the Safety Programs Notebooks located in the main office and on the Run Desk.

Advanced Heat Treat Corp. requires and encourages participation by all employees with this plan. Any questions, comments, or suggestions, concerning this plan, should be brought to the attention of Human Resources Manager, Assistant Operations Manager, or Safety Coordinator.



FIRE PREVENTION PLAN  
(Employee Fire Prevention Plans)  
1910.38(b)

In order to establish and maintain a working environment where all employees are protected from fire hazards, Advanced Heat Treat, Corp. has established and will maintain the following Fire Prevention Plan. This plan will meet or exceed Iowa Occupational Safety and Health Standards for General Industry 1910.38(b).

All employees are responsible for their cooperation with this Fire Prevention Plan.

(b)(1)

This plan applies to all fire prevention plans required by a particular Occupational Safety and Health Act (OSHA) standard. Advanced Heat Treat, Corp. has established and will maintain a written Fire Prevention Plan.

(b)(2)(i)

Advanced Heat Treat, Corp. has identified and listed the major workplace fire hazards:

- a) *Class A fire hazards are located at the railroad ties and wooden pallets outside the west end of the building.*
- b) *Class B fire hazards exist in the container of gas for the lawn mower at the west end of the building, the kerosene for the power washer at the power washer location, the pump oil storage center of the north wall, the 1,1,1 - Trichloroethane for use in the vapor degreasers, the alcohol in the lab, the oxygen and acetylene welding/cutting gases used throughout the plant, and the nitrogen, hydrogen, methane, and oxygen gasses used in the vacuum chambers throughout the plant and stored outside the northwest corner of the building and in the center of the north wall.*
- c) *Class C fire hazards exist in power supply units throughout the plant.*
- d) *Class D fire hazards exist in the machining titanium for lab samples.*

All materials and equipment creating a fire hazard will be properly handled and stored:

- a) *Materials and equipment creating a Class A fire hazards shall be kept clear of potential ignition sources.*
- b) *Materials creating a Class B fire hazards shall be kept clear of potential ignition sources unless required for proper use of materials. Materials will be stored in properly labeled, closed containers. Only approved containers and portable tanks shall be used. When dispensing Class I liquids, the nozzle and container shall be electrically interconnected.*
- c) *Materials and equipment creating a Class C fire hazard will be properly maintained. All employees shall properly use electrical equipment.*

All potential ignition sources will be controlled by elimination or containment in order to prevent contact with workplace fire hazards. *Potential ignition sources have been identified as all power supplies throughout the plant. These include; smoking and matches or lighters throughout the plant, Arc welding where needed, oxy acetylene cutting torch where needed, static electricity, and process arcing inside chambers. Signs will be posted where necessary to remind and instruct employees to eliminate potential ignition sources in areas containing materials that are potential fire hazards.*

## AHT FIRE PREVENTION PLAN - BURTON

*Advanced Heat Treat, Corp. has two available sources of fire protection equipment. The Waterloo Fire Department is located approximately two miles from Advanced Heat Treat Corp. The fire department is available as needed and is equipped to handle all classes of fires. The second available source of fire protection equipment is the in-house system of portable extinguishers for Class A, B, and C fires. All employees should be aware of the location and class of fire extinguishers in their immediate working area. Only those employees properly trained and authorized to use portable extinguishers shall attempt to control an incipient state fire with portable extinguishers.*

(b)(5)

*Advanced Heat Treat, Corp., authorized personnel shall regularly and properly maintain, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials. Heat producing equipment includes but is not limited to furnaces above the offices and laboratory, two electrical water heaters, and the air heater hanging in the plant area. Maintenance procedures include the maintenance of safety devices which shut off fuel flow or energy when equipment is over-temperature or if a fire hazard condition is established. Maintenance procedures will include checking connections, check for correct operation of moving parts, and check equipment for any deterioration. Any maintenance required will be performed by competent persons with correct replacement parts.*

(b)(2)(i)

*Advanced Heat Treat, Corp. personnel responsible for maintenance of fire equipment and systems installed to prevent or control ignitions or fires is the Operations Manager.*

(b)(2)(iii)

*Advanced Heat Treat, Corp., personnel responsible for control of fuel source hazards is the Operations Manager.*

(b)(3)

*Advanced Heat Treat, Corp. has in place, and will maintain, housekeeping procedures that shall control accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire emergency. At the end of each working shift, time for individual clean-up is provided. Each employee will be responsible to remove all flammable and combustible waste materials and residues from his work area, surrounding area and/or specific assigned area. All waste materials will be properly disposed of in correctly identified and designed receptacles by the employee.*

*These waste receptacles will be emptied on an as-needed basis by assigned personnel who will empty contents into properly identified and designed containers so that waste materials can be safely and properly destroyed or removed from premises by authorized personnel. Clean-up shall be assigned and properly completed as often as necessary to eliminate conditions that could contribute to a fire emergency.*

(b)(4)(i)

*Advanced Heat Treat, Corp. will apprise employees of the fire hazards of the materials and processes to which they are exposed. This will be accomplished by the Hazardous Materials (Right-to-Know) training as well as Employee Fire Prevention Plan Training. Properties of materials, pertaining to fire hazards, are identified for every material by the Material Data Sheet for that material.*

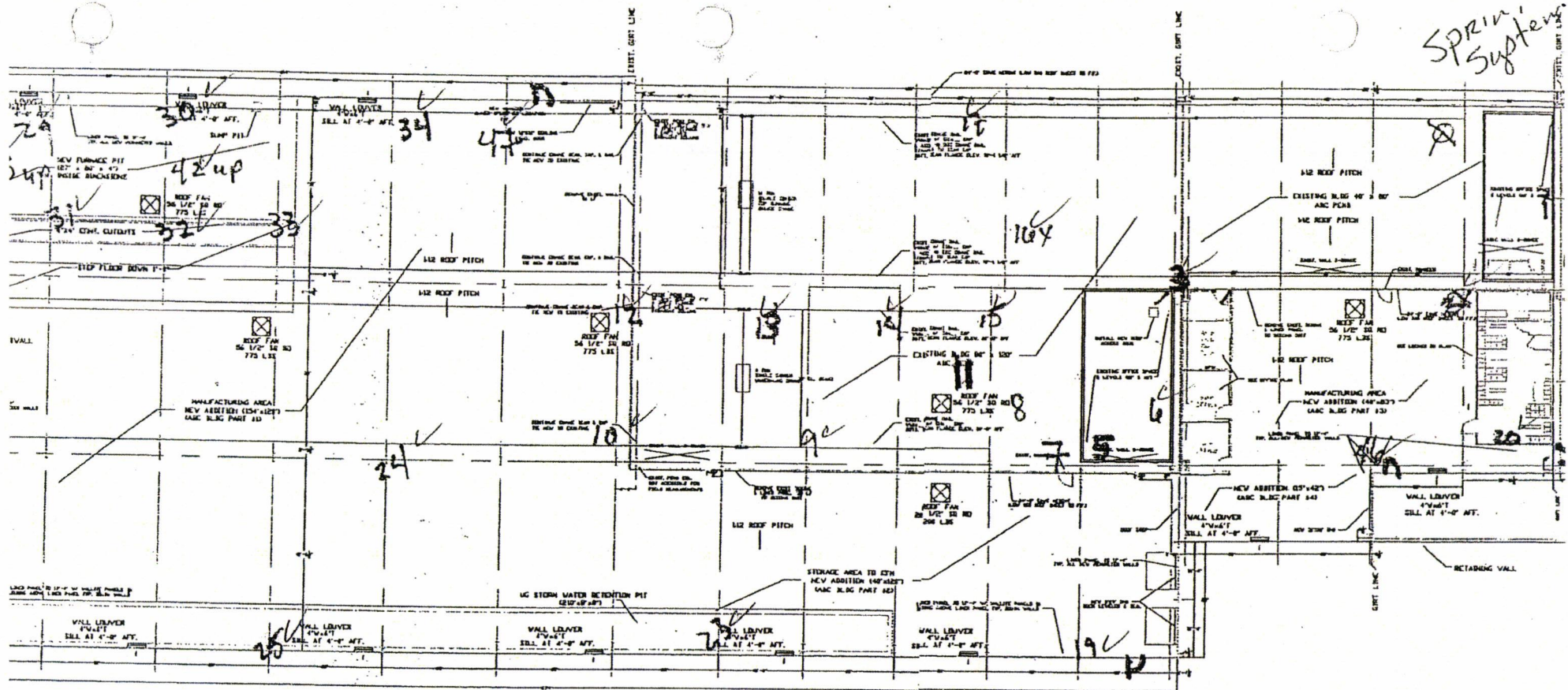
(b)(4)(ii)

## AHT FIRE PREVENTION PLAN - BURTON

Advanced Heat Treat, Corp. shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency. Additional review(s) are necessary if the fire hazard of the work area is changed or if the employee is re-assigned to an area having different fire hazards.

Copies of the Advanced Heat Treat, Corp. Fire Prevention Plan are located in the Safety Programs Notebooks in the main office and in the shop, and are available for employee review.

Advanced Heat Treat, Corp. requires and encourages participation by all employees with this plan. *Any condition that exists, which might contribute to a fire emergency, should be brought to the attention of the Operations Manager.*



- ks

#45

WELDING CART

#40

CUTTING TORCH

#39
- lift #41

#44

FLOOR PLAN

Fire Extinguishers

#18 Break room

#21 Inside

#4 - Storage

#5 OLD LOCK

FUR MARKET

#35 - OH Door west end

#34 - Welding booth

#37 - S of walkway to storage

#38 Inside E Door

AS-BUILT 9/28,



# AMTC Information Request 5

IND UNIT 100B (Yearly) - (PM)	April		form Z.19-3	
IND UNIT 200A (Yearly) - (PM)	May		form Z.19-3	
IND UNIT 250 (Yearly) - (PM)	May		form Z.19-3	
Pacemaker BA 1500 lbs (Yearly) - (PM) -	June		form Z.19-4	
Temper BB - (Yearly) - (PM) -	Jan	2/8/08	form Z.19-11	DM
Temper BW- (Yearly) - (PM) -	Feb		form Z.19-10	
Temper BV (Yearly) - (PM) -	Oct		form Z.19-9	
Pacemaker BF 500 lbs - (Yearly) - (PM) -	May		form Z.19-4	
Temper BG - (Yearly) - (PM) -	April		form Z.19-8	
Pacemaker BE 750 lbs - (Yearly) - (PM) -	Dec		form Z.19-4	
Temper BJ (Yearly) (PM)	Nov.		form Z.19-12	
Temper BK (Yearly) (PM)	Dec		form Z.19-14	
Temper BD - (Yearly) - (PM) -	Oct		form Z.19-13	
Pacemaker BC 1500 lbs - (Yearly) - (PM)	Dec		form Z.19-4	
Pacemaker BX	Feb		form Z.19-4	
AIR COMPRESSOR - Check Oil level (Change oil Jan/April/August/Dec)	Monthly		See equipment	
AIR COMPRESSORS ▲			See Z.35	
Send Oil for analysis - each furnace (BA, BF, BE, BC, BX)	Dec / June			
PMs are to be done prior to temperature surveys or calibrations				

## FIRE EXTINGUISHER & ALARM INSPECTION - MONTHLY ✓ See attached Map

LOCATION	DATE INSPECTED	Inspected BY - INIT	STATUS.
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	1/29/08	DM	OK

Solvent Log Z.53 to Office	(monthly) Init. <i>RL</i>	Lab Filter ckd /replace 12 X 20 X 1 pleated	(monthly) 1/29/08 Init. <i>DM</i>	Office Filter ckd /replace 20 X 20 X 1	(monthly) 1/29/08 Init. <i>DM</i>
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See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.



# AMTC Information Requests

IND UNIT 100B (Yearly) - (PM)	April	NA	form Z.19-3	
IND UNIT 200A (Yearly) - (PM)	May	NA	form Z.19-3	
IND UNIT 250 (Yearly) - (PM)	May	NA	form Z.19-3	
Pacemaker BA 1500 lbs (Yearly) - (PM) -	June	NA	form Z.19-4	
Temper BB - (Yearly) - (PM) -	Jan	NA	form Z.19-11	
Temper BW- (Yearly) - (PM) -	Feb	NA	form Z.19-10	
Temper BV (Yearly) - (PM) -	Oct	NA	form Z.19-9	
Pacemaker BF 500 lbs - (Yearly) - (PM) -	May	NA	form Z.19-4	
Temper BG - (Yearly) - (PM) -	April	NA	form Z.19-8	
Pacemaker BE 750 lbs - (Yearly) - (PM) -	Dec	12/27	form Z.19-4	DM
Temper BJ (Yearly) (PM)	Nov.	NA	form Z.19-12	
Temper BK (Yearly) (PM)	Dec	12/27	form Z.19-14	DM
Temper BD - (Yearly) - (PM) -	Oct	NA	form Z.19-13	
Pacemaker BC 1500 lbs - (Yearly) - (PM)	Dec	12/26/07	form Z.19-4	DM
Pacemaker BX	Feb	NA	form Z.19-4	
AIR COMPRESSOR - Check Oil level (Change oil Jan/April/August/Dec)	Monthly	NA	See equipment	
AIR COMPRESSORS ▲		NA	See Z.35	
Send Oil for analysis - each furnace (BA, BF, BE, BC, BX)	Dec / June	12/26/07		DM
PMs are to be done prior to temperature surveys or calibrations				

## FIRE EXTINGUISHER & ALARM INSPECTION - MONTHLY ✓ See attached Map

LOCATION	DATE INSPECTED	Inspected BY - INIT	STATUS.
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	12/26/07	DM	OK

Solvent Log Z.53 to Office	(monthly) Init. <i>AL</i>	Lab Filter <u>ckd</u> / replace 12 X 20 X 1 pleated 12/27/07	(monthly) Init. <i>DM</i>	Office Filter <u>ckd</u> <u>replace</u> 20 X 20 X 1	(monthly) 12/28/07 Init. <i>DM</i>
----------------------------	---------------------------	---	---------------------------	--	---------------------------------------

See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.



# AMTC Information Request 5

IND UNIT 100B (Yearly) - (PM)	April		form Z.19-3	
IND UNIT 200A (Yearly) - (PM)	May		form Z.19-3	
IND UNIT 250 (Yearly) - (PM)	May		form Z.19-3	
Pacemaker BA 1500 lbs (Yearly) - (PM) -	June		form Z.19-4	
Temper BB - (Yearly) - (PM) -	Jan		form Z.19-11	
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Temper BG - (Yearly) - (PM) -	April		form Z.19-8	
Pacemaker BE 750 lbs - (Yearly) - (PM) -	Dec	↓	form Z.19-4	↓
Temper BJ (Yearly) (PM)	Nov.	12/3/07	form Z.19-12	DM
Temper BK (Yearly) (PM)	Dec	NA	form Z.19-14	NA
Temper BD - (Yearly) - (PM) -	Oct	↓	form Z.19-13	↓
Pacemaker BC 1500 lbs - (Yearly) - (PM)	Dec	↓	form Z.19-4	↓
Pacemaker BX	Feb	↓	form Z.19-4	↓
AIR COMPRESSOR - Check Oil level (Change oil Jan/April/August/Dec)	Monthly	12/3/07	See equipment	DM
AIR COMPRESSORS ▲			See Z.35	
Send Oil for analysis - each furnace (BA, BF, BE, BC, BX)	Dec / June	NA		NA
PMs are to be done prior to temperature surveys or calibrations				

## **FIRE EXTINGUISHER & ALARM INSPECTION - MONTHLY** ✓ See attached Map

LOCATION	DATE INSPECTED	Inspected BY - INIT	STATUS
Check Fire Extinguishers per Z170 layout attached (17 + 5 on portable units)	11/29/07	DM	O.K.

Solvent Log Z.53 to Office	(monthly) Init. <i>RU</i>	Lab Filter <i>checked</i> / replace 12 X 20 X 1 pleated	(monthly) Init. <i>DM</i>	Office Filter <i>checked</i> / replace 20 X 20 X 1	(monthly) Init. <i>DM</i>
----------------------------	---------------------------	--	---------------------------	---	---------------------------

See Equipment Maintenance Log at/with the equipment for: Three Induction units (also see ownership log, calibration forms and calibration logs), two ovens and two walk behind fork lifts.





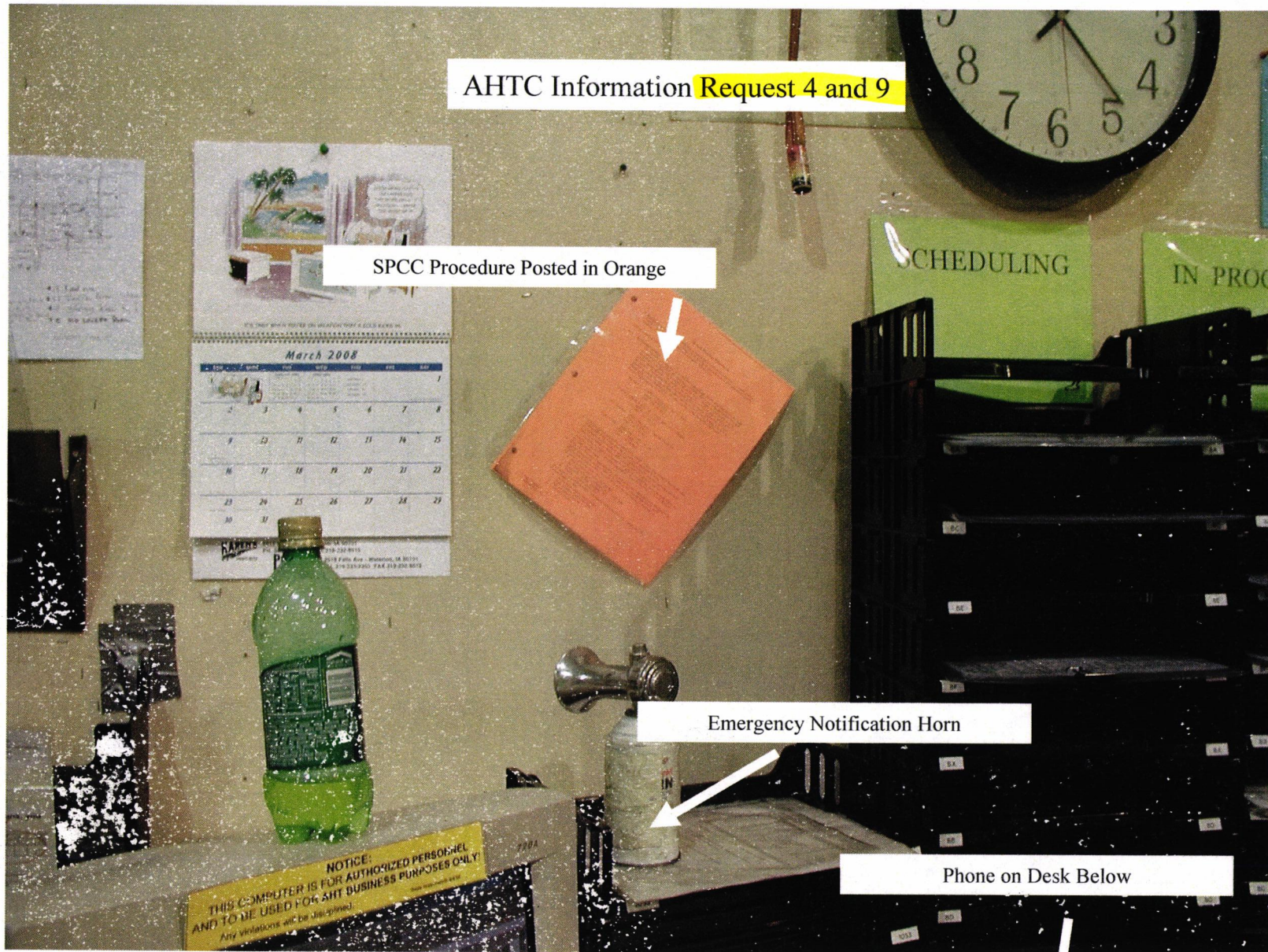
Hazardous Waste Cart with accumulation drum of TCE in foreground.  
Information Request 4.





Fire extinguisher and air horn by hazardous waste cart. Information Request  
Nos. 4 and 6





Production Office Area



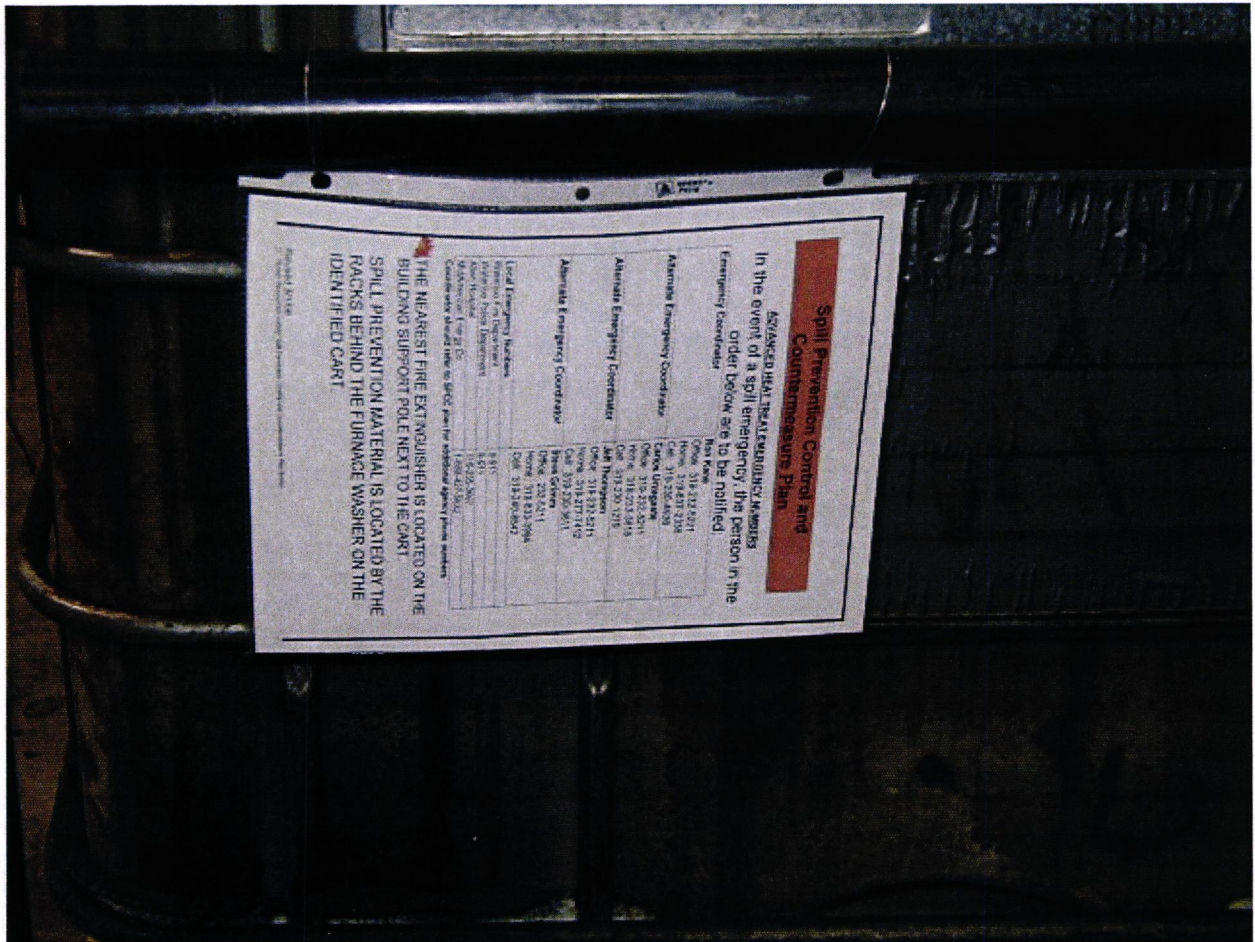
AHTC Requested Information 5

Visual Signs indicating  
Spill Prevention Materials



Spill Prevention Materials





Emergency Phone Number on hazardous waste cart – Information Request 8



## AHTC Information Request 8

### 7.0 Spill Response Procedures

- 7.1 Spill Response Procedures – The following procedures are to be followed whenever oil is released within or outside of the confines of AHTC buildings. If the spill has the potential to leave plant property and/or enter a waterway, that event will be considered an emergency spill situation.

#### 112.7 (a) (3)(vi) & 112.7 (a)(4)

##### 7.1.1 Notification Procedure

- The individual who discovers an oil spill should immediately dial the main plant number and page the emergency coordinator. The emergency coordinator must be contacted immediately for a spill notification. Telephones are located throughout the facility. Telephones are available in all oil product load/unload areas. The facility is small enough that employees may be notified visually of the situation. Provide information on the material spilled or released, the location, estimated quantity of release, direction of release, and if any injuries are involved. Specify if the spill has the potential to leave plant property. The phone numbers of the emergency coordinators responsible for handling oil spills are:

Ron Kane            Office: 319-232-5221, Page Ron Kane  
Home: 319-637-2338  
Cell: 319-230-4936

Carlos Urzagaste   Office: 319-232-5221, Page Carlos Urzagaste  
Home: 319-233-3815  
Cell: 319-230-1279

Jeff Thompson     Office: 319-232-5221, Page Jeff Thompson  
Home: 319-277-2412  
Cell: 319-230-3611

Stephen Grimm     Office: 319-232-5221, ext. 221  
Home: 319-833-.994  
Cell: 319-240-8842

- If the employee is qualified and appropriately trained, he or she may attempt to stop the discharge or defensively block it from entering storm drains or leaving the building.
- The employee should wait by the spill site until the emergency response coordinator gets there. Direct any pedestrian or vehicle traffic out of the path of the spill until that time.
- The emergency coordinator shall report to the spill site and make the determination of whether the incident is within AHTC's emergency capabilities. This individual then contacts the Waterloo Fire Dept. for assistance.
- If the spill is beyond in-house capabilities, the emergency coordinator shall notify the appropriate agencies and personnel listed in Appendix D. If the spill involves the transformer, notify MidAmerican Energy at 1-800-595-5325. If the spill reaches a navigable waterway, the emergency coordinator must contact:

- National Response Center: 800-424-8802
- Iowa DNR Emergency Response Unit: 515-281-8694
- Waterloo Police Dept. Emergency 911
- Waterloo Fire Department: 911

The emergency coordinator should be prepared to deliver the following information to the National Response Center:

- Facility name, address, phone number
- Name and title of person reporting
- Date and time of incident

### AHTC Information Request 8

- d) Location of incident
- e) Type and quantity of oil released
- f) Source and cause of oil discharge
- g) Description of all affected media – air, water, soil
- h) Damage caused by the discharge
- i) Spill response actions to stop, mitigate, and remove effects of discharge
- j) Agencies and organizations contacted
- k) Threat to surrounding neighborhood or local citizens. Is an evacuation needed?
- l) Weather conditions
- m) Telephone numbers where people can be reached for more information

### 112.7 (a)(3)(iv)

#### 7.1.2 Spill Response Procedure

- Evacuate the incident area as needed. Put warning tape around the spill perimeter to keep untrained personnel out of the area. If outside, keep people upwind of the release.
- Have response personnel don the appropriate personal protective equipment.
- Initiate spill containment measures using oil absorbent and other equipment as needed.
- Set up portable pumps to pump spilled material into containers or oil storage tanks, as needed.
- After the liquid has been largely removed, clean up the spill area using absorbents, brooms, pads, shovels, or any other necessary equipment to leave the spill area in good clean condition.
- Ideally, all spill cleanup materials should be placed in DOT 55-gallon drums, so they can be shipped to an appropriate treatment, storage, and disposal facility.
- The Waterloo Fire Department will handle any spills involving fire or those beyond AHTC's capability.
- Emergency coordinator completes Spill Event Information Form in Appendix F and any written reports required by local, state or federal agencies. Note spill on record in Appendix G if spill was reportable to IDNR or the NRC. A follow-up report to the National Response Center is required within 15 days of telephone notification of the release.

#### 7.1.3 Transformer Spill Response Procedure - In the event there is an oil release by the transformer at AHTC, the following procedure will be initiated:

- Contact MidAmerican Energy Co. at 1-800-595-5325 and report a spill of oil.
- Contain as able.

#### 7.1.4 Emergency Spill Response Equipment - The following emergency response equipment is maintained at the AHTC site:

Fire extinguishers  
First aid supplies  
Floor Dri Oil absorbent  
DOT 55-gallon closed top and open top drum and 275 gallon totes  
Shovels, brooms, mops, squeegees, and buckets  
Personal Protective Equipment including boots, face shields, and gloves

### 112.7 (a)(3)(v)

#### 7.1.5 Disposal of Recovered Materials – Materials recovered from oil releases are disposed in accord with local, state, and federal requirements. Recovered oil soaked solids are placed in DOT approved 55-gallon drums and oil absorbents and discarded PPE are placed in open top DOT approved 55-gallon and managed through Hydrite Chemical in Waterloo. Used oil is picked up by Cedar Falls Oil, and used to make asphalt or burned in furnaces.